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UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

KATHRYN MAYORGA,  
  
Plaintiff,  
  
vs.  
  
CRISTIANO RONALDO,  
  
Defendant.

Case No. 2:19-cv-00168-JAD-DJA

**STIPULATION AND ORDER  
EXTENDING TIME FOR DEFENDANT  
TO FILE OPPOSITIONS TO  
PLAINTIFF'S OBJECTIONS TO  
REPORT AND RECOMMENDATION  
GRANTING DEFENDANT'S MOTION  
FOR TERMINAL SANCTIONS,  
PLAINTIFF'S OBJECTIONS TO  
MAGISTRATE JUDGE'S  
RECOMMENDATION DENYING IN  
CAMERA REVIEW AND PLAINTIFF'S  
MOTION TO AMEND ORDER  
SUSTAINING IN PART OBJECTION  
AND ADOPTING AND MODIFYING IN  
PART REPORT &  
RECOMMENDATION [ECF NOS. 153,  
154 AND 152]  
(FIRST REQUEST FOR EXTENSION)**

Plaintiff, Kathryn Mayorga, by and through her attorneys, Stovall & Associates,  
Defendant, Cristiano Ronaldo, by and through his attorneys, Christiansen Trial Lawyers,  
(collectively referred to as the "PARTIES") enter into the following stipulation and proposed  
order to allow Defendant Ronaldo an extension of the time in which to file oppositions to



1 Plaintiff's Objections to Report and Recommendation Granting Defendant's Motion for Terminal  
 2 Sanctions [ECF No. 153, filed under seal]; Plaintiff's Objection to Magistrate Judge's  
 3 Recommendation Denying in Camera Review [ECF No. 152, filed under seal]; and Plaintiff's  
 4 Motion to Amend Order Sustaining in Part Objection and Adopting and Modifying in Part Report  
 5 and Recommendation [ECF No. 154, filed under seal] (collectively referred to herein as  
 6 "Plaintiff's Objections and Motion to Amend").

7 1. Plaintiff's Objections and Motion to Amend were filed on November 5, 2021,  
 8 making Plaintiff's three opposing briefs due on or before November 19, 2021.

9 2. Thursday, November 11, 2021, was a federal holiday.

10 3. One of Defendant's lead lawyers was out of the jurisdiction from November 10-  
 11 November 14, 2021, for pre-scheduled travel plans.

12 4. During the week of November 15-19, Defendant's lead lawyers had motion  
 13 hearings in other matters, a deposition out of state and numerous other opposition deadlines.

14 5. Because of Counsel's travel plans, workload on other matters, the upcoming  
 15 Thanksgiving holiday and the gravity and complexity of issues raised, additional time is necessary  
 16 to oppose Plaintiff's Objections and Motion to Amend.

17 6. Accordingly, the Parties agree that the deadline for Defendant to file Oppositions  
 18 to Plaintiff's Objections and Motion to Amend shall be extended for a period of two weeks, that  
 19 is until December 3, 2021.

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7. The Parties stipulate good cause exists for the agreed upon extensions, which are made in good faith and not for purposes of delay.

Respectfully Submitted this 18th day of November, 2021.

CHRISTIANSEN TRIAL LAWYERS

STOVALL & ASSOCIATES

/s/ Kendelea L. Works, Esq.

/s/ Leslie M. Stovall, Esq.

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*Attorneys for Defendant Cristiano Ronaldo*

*Attorneys for Plaintiff Kathryn Mayorga*

**ORDER**

IT IS SO ORDERED.

DATED this \_\_\_\_\_ day of November, 2021.

\_\_\_\_\_  
U. S. DISTRICT JUDGE

CHRISTIANSEN  
— TRIAL LAWYERS —



**From:** Les Stovall les@lesstovall.com  
**Subject:** RE: CR adv. Mayorga: draft SAO to extend opp deadlines  
**Date:** November 18, 2021 at 3:33 PM  
**To:** Kendelee Works kworks@christiansenlaw.com, Maria Hernandez maria@lesstovall.com, Ross Moynihan ross@lesstovall.com  
**Cc:** Peter S. Christiansen pete@christiansenlaw.com, Jonathan Crain jcrain@christiansenlaw.com, Whitney Barrett wbarrett@christiansenlaw.com, Keely Perdue keely@christiansenlaw.com

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Kendelee- I believe this stip should go to the district court - but you can use my signature either on this stip or one submitted to the district court - ty/lms

-----Original Message-----

From: Kendelee Works <kworks@christiansenlaw.com>  
Sent: Thursday, November 18, 2021 3:09 PM  
To: Les Stovall <les@lesstovall.com>; Maria Hernandez <maria@lesstovall.com>; Ross Moynihan <ross@lesstovall.com>  
Cc: Peter S. Christiansen <pete@christiansenlaw.com>; Jonathan Crain <jcrain@christiansenlaw.com>; Whitney Barrett <wbarrett@christiansenlaw.com>; Keely Perdue <keely@christiansenlaw.com>  
Subject: CR adv. Mayorga: draft SAO to extend opp deadlines

Les,

The draft stip to extend is attached for your review. Please let us know if you have changes or if we may submit with your electronic signature.

Thank you,  
KLW